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*Counsel for Defendant*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KEVIN MEAGHER on behalf of himself and  
REBECCA DAWSON on behalf of  
themselves and all other similarly situated  
individuals,

Plaintiffs,

v.

KTC HOLDING COMPANY f/k/a THE  
KINGDOM TRUST COMPANY,

Defendant.

CASE NO. 2:24-cv-01630-CDS-MDC

**STIPULATION AND PROPOSED ORDER  
TO EXTEND TIME TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)**

Plaintiffs KEVIN MEAGHER, on behalf of himself and on behalf of others similarly situated, and REBECCA DAWSON (“Plaintiffs”), and Defendant KTC HOLDING COMPANY, formerly known as THE KINGDOM TRUST COMPANY (“Defendant”), by and through their respective counsel, and pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby stipulate and agree as follows:

WHEREAS, Plaintiffs filed their complaint on September 4, 2024 (ECF No. 1);

WHEREAS, waiver of service executed on behalf of Defendant was filed on September 10, 2024 (ECF No. 7), making the deadline to respond to the complaint November 9, 2024;

WHEREAS, Plaintiffs filed their First Amended Complaint on November 8, 2024 (ECF No. 13), making the deadline to respond to the amended complaint November 25,

2024;

WHEREAS, Plaintiffs have agreed to an extension of time for Defendant to respond to the amended complaint, namely, January 17, 2025, to allow the Parties to continue ongoing settlement discussions and to accommodate the extension request by Defendant's counsel;

NOW, THEREFORE, in consideration of the foregoing, the Parties hereby STIPULATE and AGREE that the deadline for Defendant to respond to the amended complaint is January 17, 2025.

The Parties represent this stipulation is made in good faith and not for the purposes of delay.

**IT IS SO STIPULATED.**

Dated this 21<sup>st</sup> day of November, 2024.

Dated this 21<sup>st</sup> day of November, 2024.

/s/ Eric W. Swanis

/s/ Kennedy M. Brian

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**IT IS SO ORDERED.**

Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge  
DATED: 11/25/2024

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